VARNUM, RIDDERING, SCHMIDT & HOWLETTup

09/02/98

BRIDGEWATER PLACE
POST OFFICE BOX 352 · GRAND RAPIDS, MICHIGAN 49501-0352
TELEPHONE 616/336-6000 · FAX 616/336-7000



MARK M. DAVIS
LICENSED TO PRACTICE IN MICHIGAN AND WISCONSIN

DIRECT DIAL 616/336-6733 E-MAIL mmdavis@vrsh.com

September 4, 1998

VIA HAND DELIVERY

Clerk of the Court U.S. District Court Western District of Michigan Federal Building 110 Michigan Street, N.W. Grand Rapids, Michigan 49503

United States of America v. City of Albion, Michigan

Case No. 1:97-CV-1037

Dear Clerk:

Re:

Enclosed for filing in the above-referenced matter please find the original plus one copy of Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's Responses to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request For Production. Also enclosed is a Proof of Service showing service on all counsel of record. Please return time stamped copies to the messenger who delivers this package.

By filing Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's Responses to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request For Production, Defendant/Third-Party Plaintiff/Counter-Defendant City of

VARNUM, RIDDERING, SCHMIDT & HOWLETTLLP

Clerk of the Court September 4, 1998 Page 2

Albion does not waive any objections it may have as to compliance with Federal Rule of Civil Procedure 26(d) on timing and sequence of discovery.

Very truly yours,

VARNUM, RIDDERING, SCHMIDT & HOWLET July

Mark M. Davis

MMD:tas Enclosures

cc: Francis J. Biros

W. Francesca Ferguson Kathleen K. Schnieders Eugene E. Smary Alan Wasserman

Philip M. Moilanen

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA, Plaintiff.

v.

CIVIL ACTION NO. 1:97-CV-1037

Hon. David W. McKeague ICHIGAN,

CITY OF ALBION, MICHIGAN,
Defendant/Third-Party
Plaintiff/Counter-Defendant,

v.

COOPER INDUSTRIES, INC., and CORNING INCORPORATED,

Third-Party Defendants/Counter-Plaintiff/Third-Party Plaintiffs,

CITY OF ALBION'S RESPONSES
TO THIRD-PARTY DEFENDANTS
COOPER AND CORNING'S SECOND
SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION

v.
DECKER MANUFACTURING CORPORATION,
Third-Party Defendant.

Francis J. Biros
Trial Attorney
Attorney for Plaintiff
Environmental Enforcement Section
Environment and Natural Resources Division
UNITED STATES DEPARTMENT
OF JUSTICE
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
(202) 616-6552

Eugene E. Smary (P26811)
Melvin G. Moseley, Jr. (P44297)
Daniel K. DeWitt (P51756)
WARNER NORCROSS & JUDD
Attorneys for Third-Party Defendants/CounterPlaintiff/Third-Party Plaintiffs, Cooper
Industries, Inc. and Corning Incorporated
900 Old Kent Building
Grand Rapids, Michigan 49503
(616) 752-2000

Charles M. Denton (P33269)
Mark M. Davis (P43529)
VARNUM, RIDDERING, SCHMIDT
& HOWLETTLLP
Attorneys for Defendant/Third-Party
Plaintiff/Counter-Defendant City of Albion
Bridgewater Place, P.O. Box 352
Grand Rapids, Michigan 49501-0352
(616) 336-6000

Alan D. Wasserman (P39509)
Michael L. Caldwell (P40554)
FINK ZAUSMER, P.C.
Attorneys for Third-Party Defendant
Decker Manufacturing Corporation
31700 Middlebelt Road, Suite 150
Farmington Hills, Michigan 48334
(248) 851-4111

Philip M. Moilanen (P17874)
BULLEN, MOILANEN, KLAASEN & SWAN, P.C.
Attorney for Third-Party Defendant
Decker Manufacturing Corporation
402 S. Brown Street
Jackson, Michigan 49203-1426
(517) 788-8500

CITY OF ALBION'S RESPONSES TO THIRD-PARTY DEFENDANTS COOPER AND CORNING'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION

NOW COMES Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion, by and through its attorneys Varnum, Riddering, Schmidt & Howlettler, and responds to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production dated July 31, 1998, as follows:

GENERAL OBJECTIONS

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion responds to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production in accordance with the requirements and scope of Federal Rules of Civil Procedure 26, 33, and 34. Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to the instructions and definitions contained in Cooper and Corning's Second Set of Interrogatories and Request for Production to the extent they purport to impose obligations on Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion in excess of those imposed by the applicable Federal Rules of Civil Procedure. Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion further objects to these Interrogatories and Request for Production to the extent that they would purport to require that Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion conduct research and investigations to acquire information not presently within its possession or to compile or evaluate information in a manner that is unduly burdensome.

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production to the extent they call for the disclosure of information or documents subject to the attorney-client privilege or work-product protections or which are proprietary, confidential, and/or a trade secret. Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion further objects to Interrogatories and Request of Production to the extent they seek documents that are already in Third-Party Defendants Cooper and Corning's possession, or seek information and documents publicly available through the U.S. Environmental Protection Agency ("U.S. EPA") or Michigan Department of Environmental Quality ("MDEQ") files maintained relative to the Site, to which Third-Party Defendants Cooper and Corning are referred.

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to each Interrogatory and Document Request to the extent it calls for disclosure of information or documents which are unrelated to any alleged release or disposal of hazardous substances at the Gordon D. Stevick Site in Sheridan Township, Michigan, which is the subject of this litigation, since such discovery request are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence relevant to the parties' claims and defenses in this action.

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion further states that it has not completed its investigation of the facts relating to this matter, and discovery and

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's search for documents and related material is ongoing. Responses of the Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion are provided without prejudice to the Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's rights to assert additional objections or provide supplemental responses pursuant to Federal Rule of Civil Procedure 26(e). Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion also does not concede by providing information or documents that such are relevant to this action or waive any other evidentiary objections. To the extent these Interrogatories and Request for Production require "all," "any," "every," "each," or similar term, or seek complete detail of legal contentions and conclusions in this action, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects that such requests are overly broad, unduly burdensome, and premature at this stage of the action.

The foregoing General Objections are hereby incorporated into each of the numbered answers to the Interrogatories and Request for Production below. Subject to and without waiving its General Objections, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion responds to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production as follows:

INTERROGATORIES

INTERROGATORY No. 1: Identify by name and current home address, business address and phone number, each City of Albion mayor, city manager, city clerk, city treasurer, city council person, and city superintendent of public utilities, from 1966 to 1981.

ANSWER No. 1: Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to this Interrogatory to the extent that it is overly broad, vague, unduly burdensome, and seeks disclosure of information that is protected by the attorney-client privilege and/or work-product doctrine. Subject to and without waiving its objections, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion states that based upon information now known to Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion, the following are the known names and current home addresses, business addresses, and phone numbers, of each City of Albion Mayor, City Manager, City Clerk, City Treasurer, City Council Person, and City Superintendent of Public Utilities, from 1966 to 1981:

Mayor of Albion

1966-1974 Victor Burstein, 1004 Locust Lane, Albion, MI 49224 (517\629-4606) Retired

1975-1981 Charles Jones, Unknown Address in Ohio

City Manager

1966 - 1970 Albert Glassford, 376 Thornapple Lake Road, Nashville, MI 49073 (616) 1970 - 1977 Neal Godby, Brimley, MI 49715 (906)437-5215) 1977 - 1981 Lee Davis, Green Bay, WI (920\498-9039) Work: (920\468-4000)

Nov. 1981 George Kolb, Richmond, Virginia

City Clerk

1966 - 1972 Howard Bradley - DECEASED

1972 - 1975 Glen Burcham, 308 Booth Drive, Albion, MI 49224 (517\629-2495)

1975 - 1979 Millard Coleman, possibly in Ann Arbor, MI

1979 - 1981 A. Dean Moore, Unknown Address

City Treasurer

1966 - 1971 Howard Bradley - DECEASED

1972 - 1975 Glen Burcham, 308 Booth Drive, Albion, MI 49224 (517\629-2495)

1975 - 1978 Millard Coleman, possibly in Ann Arbor, MI

1979 - 1981 A. Dean Moore, Unknown Address

City Superintendent of Public Utilities

1966 - 1981 William Rieger, 24751 Maple Knoll, Coldwater, MI 49036

City Council Persons

1966 - 1973 Robert Holland - DECEASED

1974 John Simpson, Unknown Address

1966 - 1974 Charles Jones, Unknown Address in Ohio

1966 - 1971 Alan Gauss, 1949 Charlotte Landing, Springport, MI 49284 (517\857-3295) Retired

1966 Roger Klein, Unknown Address in Michigan

1967	Arthur Dailey - DECEASED
1966 - 1968	Norman Davey, Unknown Address
1969 - 1971	Richard McPherson, Jr., Unknown Address
1971	Howard Knorr, Unknown Address
1966 - 1969	Barry Ewbank - DECEASED
1968 - 1981	Frances Costianes, 810 Prospect, Albion, MI 49224 (517\629-3158) Retired
1970 - 1974	Jack Hill, 1291 Charlotte Landing, Springport, MI 49284 (517\857-2297) Retired
1975 - 1981	Ronald Gant, 307 Arthur Street, Albion, MI 49224 (517\629-4536) Retired
1975	Richard Tate - DECEASED
1975 - 1981	Robert Thomas, 103 S. Albion, Albion, MI 49224 (517\629-4996) United Auto Workers, Ann Arbor, MI
1972 - 1975	Robert Bradford, Unknown Address in Florida
1972 - 1975	Barbara Zikmund, Unknown Address
1975	Jose Benevidez, 1008 Hall Street, Albion, MI 49224 (Unlisted Phone)
1976 - 1981	Jack McClure - DECEASED
1976 - 1981	James Cascarelli, 1109 E. Michigan Avenue, Albion, MI 49224
	(517\629-6541), Cascarelli Tavern
1975 - 1977	Maxwell Siefert - DECEASED
1978 - 1981	Karen Harris, Unknown Address

INTERROGATORY No. 2: Describe for the period of 1966 to 1981, any taxes or assessments levied or assessed by the City of Albion against any business in the City of Albion that were attributed to, allocated for, or related to the Site.

Answer No. 2: Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to this Interrogatory to the extent that it is overly broad, vague, unduly burdensome, and seeks disclosure of information that is protected by the attorney-client privilege and/or work-product doctrine. Subject to and without waiving its objections, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion states that, based upon information now known to Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion, there are no current City of Albion records from 1966 to 1981 specifically regarding any taxes or assessments levied or assessed by the City of Albion against any business in the City of Albion that were attributed to, allocated for, or related to the Site. In further answer, Defendant/Third-Party Plaintiff/Counter-Defendant/Counter-Claimant City of Albion states, upon information and belief that revenues from the general assessment would have been used to pay Mr. Stevick for the City of Albion residents' use of his privately owned and privately operated Landfill, pursuant to the City's agreement with Mr. Stevick.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION No. 1: Produce all documents that are, or that evidence, the tax assessments and levies described in Interrogatory No. 2, above.

RESPONSE No. 1: Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to this Request to the extent it seeks information that is protected by the attorney-client privilege, work-product doctrine and to the extent that it seeks documents that are neither relevant nor reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving its objection, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion states that there are no City of Albion documents responsive to this request, but that the documents attached hereto, which were provided by City employees from their personal files, would indicate that revenues from the general tax assessment may have been used to pay for the City of Albion residents' use of Mr. Stevick's privately owned and operated Landfill, pursuant to the City's agreement with Mr. Stevick.

CERTIFICATION

I, Kim Cox, City Manager for the City of Albion, hereby state that I have reviewed the foregoing Responses to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request For Production and that said Responses are true and correct to the best of my information and belief.

Dated: September 2, 1998

1998.

Kim Cox, City Manager, City of Albion

Subscribed and sworn to before me, a notary public, this 2nd day of September,

Notary Public,

County, Michigan

My Commission Expires:

MITTIE D. JONES

Notary Public, Calhoun County, Michigan
My Commission Expires September 22, 2002

Respectfully submitted,

VARNUM, RIDDERING, SCHMIDT & HOWLETTLLP
Attorneys for Defendant/Third-Party Plaintiff/

Counter-Defendant City of Albion

Dated: September 4, 1998

Charles M. Denton (P33269)

Mark M. Davis (P43529)

Business Address and Telephone:

Bridgewater Place, P.O. Box 352

Grand Rapids, Michigan 49501-0352

(616) 336-6000

CITY OF ALBION

ALBION	MICHIGA	٧

C 902

TAX NOTICE

196

					- J			•
JOWNSHIP	COUNTY	SCHOOL OF	HOOL RAIING	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	19.0% C. A. B. C.		SPECIAL ASSESS	TOTALS
7058				1000 1000 1600 1600 1600			*	
		_	,				TOTAL TAX	70.5
<i>:</i>	•					į	1% COLLECTION FSE	(42) (40)
· —			•				TOTAL	70.58
후 [발			*		03292 01	PARCEL CODE	39K PENALTY FEE	
) S	ALBION	MI		•	01	SCHOOL DISTRICT	TOTAL	

G F BUNDAY ADD BLK 4 LGT 2

ASSESSED VALUATION	STATE EQUALIZED VALUATIONS
3100	6422
1	

THIS IS YOUR STATEMENT OF TAXES DUE ON PROPERTY DESCRIBED.

10.99

3% PENALTY WILL BE ADDED AFTER FEB. 15.

1% PER MONTH PENALTY AFTER AUGUST 1

PRESENT OR MAIL THIS COPY WHEN PAYING TAXES

TREASUR

CITY OF ALBION

THIS IS YOUR STATEMENT OF TAXES DUE ON PROPERTY DESCRIBED BELOW, ASSESSED WIN NAME SHOWN BELOW.

1967 උ ඉ

essed Valuation tale Equalized	County Tax	Tox	School Tax	School Tex	City Tax	Special Assossmen	Tax	Total	Taxes
# #3100.00				-	79.98		·		79 .9 8

Name, Address and Description

AARONADA SA

ALB C

ALBION, MICH 49224

G.F. BUNDAYS ADDITION TO THE CITY OF ALBION

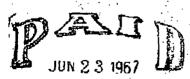
BLK 4 LOT 2.

Penaltics: 3% Penalty will be added after February 15th on the Winter toxes.

1% per month Penalty after August 10th on City (Summer) toxes.



73.45



CITY OF ALBION

GITY CLERK

TAX HOTICE

PRESENT OR MAIL THIS COPY WHEN PAYING TAYES

CITY OF ALBION

THIS IS YOUR STATEMENT OF TAXES DUE ON PROPERTY DESCRIBED BELOW, ASSESSED IN NAME SHOWN BELOW.

196

C 90.

Assessed Valuation State Equalized	County Tax	County - School Tax 3	School Tax	Chy Tax	Special Assessment	Тах	Так	Total Taxes
3,100.00 6,479.00			•••	72.51 81.07		7. 7 9		88.86

Name, Address and Description

3292

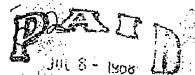
ALB C

ALBION, MICH 49224

G.E. BUNDAYS ADDITION TO THE CITY OF

BLK 4 LOT 2.

Penalties: 3% Penalty will be added after February 15th on the Winter to:
1% per month Panalty after August 10th on City (Summer) taxa



2 12 MILLS

CITY OFFE PRINCES

PERFUAN

PENSION FUND 1.

1.2 HILLS

TAX NOTICE

PRESENT OR MAIL THIS COPY WHEN PAYING TAXES

CITY OF ALBION

MICHIGAN

THIS IS YOUR STATEMENT OF TAXES DUE ON PROPERTY DESCRIBED BELOW, ASSESSED IN NAME SHOWN BELOW.

1969

			<u> </u>		42	4500	902-7
Assessed Valuation State Equalized	County Tax	School School Tex	1	Special Assessment	Тфх	Tux	Total Taxos
2 100.00			12.5			1.34	
6,479.00	<u></u>		81.07	<u> </u>		8.68	89.75 *

Name, Address and Description

3292 ALB C

ALBION, MICH 49224

G.F. BUNDAYS ADDITION TO THE CITY OF ALBION

BLK 4 LOT 2.

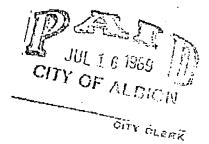
Penalties: 3% Penalty will be added after February 15th on the Winter taxes.

1% per month Penalty after August 10th on City (Summer) taxes.

V.E. - Veterans Exemption

S.C. - Senior Citizens Exemption





TAX NOTICE

PRESENT OF

CITY OF ALBION MICHIGAN

THIS IS YOUR RECEIPT FOR TAXES PAID ON PROPERTY described below, assessed in Name Shown below.

1970

Assessed Valuation State Equalized	County Tax	County	School	City				
.92		Tax	Tax	Tax 13.89	Spaciol Assassment	Tax	Tex	Total Taxas
5,100.00 5,696.00				93.00		,	1.25 8.37	101.97 %
Name,	Address and D	escription		P	200			

G.7. BUNDAYS ADDITION TO THE CITY OF ALBION BLK 4

couplishery made, a co., MILARATCO, MICH, 108 # 515211

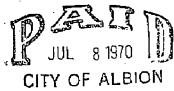
Penaltics: 3% Penalty will be added after February 15th on the Winter taxes.

1% per month Penalty after August 10th on City (Summer) taxes.

V.E. - Veterans Exemption

S.C. - Senior Citizens Exemption

15.14 MILLS



CITY CLERK

THE BOW STREE BELOW TO FINE SUBSECT TAKES UPDECING PROPERTY OF THE TOTAL YEAR HARCH I TO FEE 29. ACT TO BELLEVIA TO THE SUBSECTION OF THE PROPERTY OF THE TOTAL STATES OF THE PROPERTY OF THE TOTAL STATES OF THE PROPERTY OF THE PROPERTY OF THE TOTAL STATES OF THE PROPERTY OF THE PROPERT	À						•	•
GENERAL PRINCIPAL SELVEN DESCRIPTION BALK A LOT ZAME CHECKED TO SELVEN SERVED AND SELVEN TO SELV				•			٠,	
DESCRIBED FOR THE YEAR 1972, RURE CREAS RATGEE TO TREASURERS CITT OF ALBION TAX DUE MAD PAYAGED BY GOT 5. ISSUED 18 PER HONRI LATE FEES ARE ADDED. ISSUED 74855 TAX NO REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FILED FOR MASTE FOR DESIGN FARD REST ASS STREET ALBION FOR THE VILLE FOR FARD FOR DESIGN FARD REST ASS STREET ALBION FOR THE VILLE FARD REST ASS STREET ALBION F	A THE			TARES INDUCTURE DO	OPPORT CONTY	VETAL VETA		the state of the state of the state of
TAX NO Comparison Comparis	M-DES	CHIBED FOR THE	YEAR 1972. MAKE	CHECKS RATABLE TO		QTTY OF ALBION.		Alle and a
GENERAL PLAND F MASTE FUND PRESIDENT FARD OUT LAS SERVICES SERVER MATER SPECIAL ALBION CITY OF ALBION ALBION CITY OF ALBION CITY OF ALBIO	197	2. APTER OCT 6	TAL HER HONTH LAT	e fees are added.	1 5	HOWARD BRADLET T	reasurer Ret	
GENERAL PAND F WASTE FIND PRISIDENT TOTAL ASSET ALBION CITY OF E BUNDAYS ARCUTION BLK & LOT Za ALBION CITY OF ALBION ALBION SEP 52 107 AND CITY OF ALBION CITY OF ALBION	6	3121560	100 STATE	7+254	spicor 11			* - ·· -
ALBION CITY OF ALBION ALBION SEP 5 2 M7 ADDITION BLK 4 LOT Za ALBION SEP 5 2 M7 ADDITION BLK 4 LOT Za CITY OF ALBION FESSET OF MAIL THE COPY OF ALBION FESSET OF ALBION FESSET OF MAIL THE COPY OF ALBION FESSET O			WASTE		ALCTS.		PECIAL	
ALBION CITY OF ALBION ALBION SEP 5 2 M7 ADDITION BLK 4 LOT Za ALBION SEP 5 2 M7 ADDITION BLK 4 LOT Za CITY OF ALBION FESSET OF MAIL THE COPY OF ALBION FESSET OF ALBION FESSET OF MAIL THE COPY OF ALBION FESSET O	制。上	/0 经6 1万次	1552					EMPLOYEE BALLSTATE BALL
ALBION SEP 5 2 M7249 ALBION SEP 5 2 M7249 CITY OF ALBION CI	5333					1 1234 1388		PERRONAL CONTRACTOR OF THE PERSON NAMED IN CONTRACTOR OF THE PERSON NAMED
ALBION SEP 52 MANAGE SEP 52 MA	1.						一口/整備	PERSONAL TOTAL
CITY OF ALBION PROPERTY O		:	: · · •			4, 5, 27, 5]	SED'S 0 10201	PROPERTY RECEIPT C
CITY CLERK USE ALL MALE WILL SAVE YOU AND FIRST OF TAXES AND TIGHT AND STATE SCHOOL AND SCHOOL AN		•				C WEBJON '	CITY OF ALRICAN	ATTACABLE RET. DELC
TAX NO ERSONAL PROPERTY TAXES MUST BE FAIL BY SET 10. CITY PLANTING STORM AND STORM TOTAL CITY PLANTING STORM TOTAL STATE EXCEPTION T	1.		•			Phoretry own	THE WATER THAN ABOVE	NOT A RECEIPT UNTIL
EAALTY SEE TO PER NO. AFTEN NOT IS. PROTECT OF TAXES NOW TYON RIOR TO DESCRIPT BATE WILL SAVE YOU AUDITIONAL CHARGES. ERSONAL PROPERTY TAXES MUST BE FAIL BY NOT ID. CITY DO STATE FROM HASTE NATION ASSESSMENT TO TAKE TO T	7				* f		CITY CLERK	UREE. NOT DESPONDANCE DE PART CH WARRING DESCRIPTION
TAX NO RIOR TO DEPLITY DATE WILL SAVE YOU AUDITIONAL CHANGES. RIOR TO DEPLITY DATE WILL SAVE YOU AUDITIONAL CHANGES. RIOR TO DEPLITY DATE WILL SAVE YOU AUDITIONAL CHANGES. RIOR TO DEPLITY TAXES MUST BE FAIL BY SET 10. RIVER 114 ASSET 145 ASSET 145 ASSET 155 ASS		•	•				•	PRESENT OR MAIL THIS COPY V
TAX NO ERSONAL PROPERTY TAXES MUST SE FAID BY SET 10. PROPERTY OF SET 10. PROPERTY SET 10. PROPERTY OF SE	- C20		سده ه این استان به میدود به به به این استان به این استان به این استان به این این این این این این این این این ا استان این استان با این این این این این این این این این ای					ا مطابعت بالقار و محمد بالقارون و القارون السابق و العارون
112 A32 SI	RIOR	TO PER LITY BATE	WILL SAVE YOU'A	MODITIONAL CHARGES.		14 16 4 11 11		TAX NO
COTY DFIRE MASTE COTY DFIRE MASTE MATCH SSILES SOLID. FISC TOTAL MATCH SSILES SOLID. FI	ERSON/	AL PROPERTY TAX	ES MUST BE FAID	6Y 507 10%			ABAREK 1770	4500 902-4
CITY POLIFIE MASTE DEPENDS SUSION YARD STATE EXEMPTION MODERNY OWNER COLLECTION FEE LOTAL STATE EXEMPTION MODERNY OWNER COLLECTION FEE LOTAL SPENDS STATE EXEMPTION MODERNY OWNER COLLECTION FEE SPP. 23 1971	j Kanenas	.0 3.100	STATE	7 - 3 %(* 251	ارمود ا	KT. H. J. Sallady 99		730070-7
### 107.40 107.40	₹ Cī	TY PFIRE NA	51± 1					TOTAL /i
LSTON CITY & F QUINDAYS AGULTION TO A DE Z. 107-40 FEMALTY TOTAL SPP. 23 1971	1	2.50 \$1.40	.:90					
SPP. 23 1971				ر المسلم الم المسلم المسلم			. 10	
SEP. 23 1971		. !		•	· ·		المراجع المحتاد	
ES SPP 23 (97) - 1 E)	i	1					100000	TOTAL
					}	•	(ES) SPP 23 1971	
CITY-OF ALBIONUL A RECEIPT UNTIL		age :			\. \.	• •	CHA-OF VFBIG	KINGHAT LEIG OA ANGVE-
USCO - ADT DEGLAMERIE E P	海山	ĵ			1			DT-C ON MUCH RESERVE S. LOW. CALD' HOL DEFRANCE LE . F.

Briefer Committee Committe	
The state of the second of the	
The second secon	
	DITT OF ACHION FAIRDING CODES AND ACTION OF THE PROPERTY OF TH
A STATE OF THE PAYER BY DUTANTED BY THE STREET OF THE STREET	GLER HERMANS - PITTERESTRESS - COCO 2014 10 10 10 10 10 10 10 10 10 10 10 10 10
TO AND ARRONDED UND THE PROPERTY AS INCHES AND ARRONDED TO A CONTROL OF THE PARTY O	1. 中央通过1000000000000000000000000000000000000
THE PERSON NAMED IN COLUMN TO SERVICE AND ADDRESS OF THE PERSON NAMED IN COLUMN TO SE	REDITORS RECEIPT AND PROPERTY OF THE MODIFICATION OF THE PROPERTY OF THE PROPE
Mario	The state of the s
	CITY HANK & FRIE
ALDO OTTAL BEOMOATS CORDINATED BY A LINE OF STATE OF STAT	
	RCBION: W7000 W SECTION
	PROPERTY CHANGE OF COMPANIES ABOVE
	POTETY OWNER A CHIEF AND THE ACT PERCHETE FOR THE PER
	ARTON CONT.
A STATE OF THE PARTY OF THE PAR	South Karing Royal
THE SUN STATES BELOW IS FOR SUMMER TAXES ASSESSED UPON THE CLTY FIT	CAL YEAR MARCH 1 TO FEBRUARY 28 NO. 1
PANABLE TO CITY TREASURED. TAKES DUE AND DAVABLE HER	TY OF ALBION. CALHOUN COUNTY
SERVERSHILL SUBJUST 10. 1073 A LATE FEE DELIA DEDIMENTAL 2	LEN H BURCHAM. CITY TREASURER 42-45-00900-A 1973
"ASSESSED	LBION. M1 49224 TAX NOTE
GENERAL POLEFIRE WASTE WASTE	22:107 kg. 13 31 003 292 00 kg1
PUND: PENSION YARD	WATER SEWER SPECIAL TOTAL 11-78
19.000 (59) (59)	ASSMATA. TOTAL 11-14
ALBION CITY - G F. BUNDAYS ADDITION BLK 4 LOT 2,	98.24 QWNER.
	COLL+ FEE
•	98. <u>Z4</u> IOTAL
	RECEIPT N. RECEIPT O
· · · · · · · · · · · · · · · · · · ·	ALBION GE MI 49224 JI RET. DELO
, t	CITY OF ALEICT
	INDICATE CHARGE & CHER THAN ACCVE
	TAMPEC PA D RE INCAS
	TAMER A SECTION WAS IN THE TOTAL TO THE TAMER A SECTION OF THE TAMER

									E ON						,		#117 #1CL	AHIRT					CLATTY URE 1-00	70-1		
		GENER	KAD ED VD. PET	3.000 G10M				e is			33 }	6 (0)		ECC SHT	AC	7.74	3 31 VATE 8101		0 20		ADI	RECE		TOTA		
								T TON	BLIC A						des-			rud.		建	6.83					
									Signatur Signatur Signatur Signatur Li							ALBII	PADPERN		r mi					260m	2 W W W W W W W W W W W W W W W W W W W	Total
													3		- x-324p	**************************************							on)		57,70	or MA
S ince	44.5	ي کيد		W	10000	Stante :			فننتنت		THE PERSON	1974		`	4:	٠٠٠ - ١٠			\$ (- TO	ALA.	V2.05	<u> </u>	, -,	·		
	S S III	i stel	ED BE	Chi ya	PER SE			1978	iaesae Laske Laske	PRICE	CMB		** . **	CXL	P CENT		2012年 日本	EMINIT	a Entr	DΩTΥ ∴	· -	S-64	7902	- 	2.2	1267
	E SUI DARA TROCK	I STATE	D), J)6jk, ₁₂		19	1978	KAAKE Waado	PRICE	TO THE	5 5		ALDI VEDI		ACBID IUPO XI ISS STO HI P	NT CA ME CA REET TERRA	THRUI THE T	7 EQU 7 E E E E 7 E E E E E E E 8 E E E E E E E E E E E E	REP U	12-49		LHO	Date	B, 2 XAT	12(8) 40-2 2-4-2
		770 770	Dir. J.C.	IRDO RAS TARI) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	DO VALUE	r S	1928 1917-PP 1917-PP 1917-PP 1917-PP 1917-PP	HARAKE KARPIDE HARAKE	POPE SALE	TA MANAGEMENT OF THE PARTY OF T	50 50 50 50 50 50 50	Uktra	ALOX VEOX			NT CH ME OI REET TRACK TO DO	engui Engli	2 EQUI	RECEDENT	12-49		T NO T	E DATE	TAX	I P
		7770 1520	TOTAL TOTAL	IRDO RAS TARI) Kila P	DO VALUE	r S	1928 1917 1917 1917	HARAKE KARPIDE HARAKE		TA MANAGEMENT OF THE PARTY OF T	ACCOUNT OF	UNTO	ALDI VEDI	K QB	ACBID IUPO XI ISS STO HI P	NA CA ME CA REED REED REED REED REED REED REED REE	ENTA ECTA ECTA	2 EQUI		I PER	1 1975	T NO T	DATE	TAX	NOT

			OF SUMILE TAXE	5. A55E5SEU		LLT: T→ E ALBIDA, CAL P. CU FMAN	ognisateco	THE BITTE	
STATE OF THE PROPERTY OF THE P	AUC. VACOR OF SECUE	EATTER ADDRESS OF THE PARTY OF	9.905	1978 A LATT	MALCARD 122 H CA ALSTON,	P. COLEMAN: SS STREET HICHIGAN	CITY TREA	OREM DA	42-45-009 CELET NO (CATE)
EPOPE G ASI	TANK A PART	Control of the contro	YAND	3 7 6 6 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	PALLS REC	VIBLE	17 6	TENNO - RE	TOTAL TOTAL
aca)	ON BLILLION	A TANDES - XOD				200 ·	14 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	を表現する。 なななない。 なる。 なるない。 なるな。 なるな。 なるな。 なるな。 な。 なるな。 なるな。 な。 なる。 なる	THE STREET
				And State of the Control of the Cont			To the second	107	Distance
						ALBION	1	1-19224	
						PROPUS	TY OWNER IF OTHER T	Wheove——	METANESTICATION OF THE PARTY OF
	111		# 8				130		CH MEDITO DESCRIPTION
MALUE	FREEL BELGER		SENTES JAKES		(1991 Tee:				COSY WILL
	CABLE JUST		POTABLOS FOR	No. Laxes and	(英雄) 95.71	DICK CALH	FULL DEST OUN ACCUSED ON THE UNITED		विकास करता
1777 CENTRAL	Billion BY Det Side	CTATE OF THE PROPERTY.	1001	A Jook	ATTORETY	CHEGAN 49	724	neces	
	PERSON WAS	ATRO AND SAME STATE OF THE SAM	Mrs. 21 2		RECORD PATE	ASSMES	Y.S.	102	a project
	CITY, G.F.	BUNDAY TAPOLY	DA FINDIA LOT		<u> </u>			Since Since	2
	4	7-453	00,90	D-41		_			
		West 1	ACTIVITY.			«Littim	141	49226	Series Series
	k -			•			WHER IF CHIEF THA	* *LEVE	MOL BEMONALISE IE UV

	YALUE			vqve ·	12.750		ALBJON, N	' 49224 car <u>no: 13_51_0</u>	112 122 00	102	OFCELET NO. L.	DATE
	DEN FUND	POL	FIRE.	WAS	TE	-DEBT	ACCTS HATE	2 FPCC			TOTA	
	7,77	(株)	3379		nees-	745		(5.4)	3	201x	TO STATE OF THE PARTY OF THE PA	0
•	ALBION CI	77. 455E	SSORS PLA	T OF SU	PERIOR PE	GHTS LDT 1		784	- UATL TO		12 12 12 17 17 17 17 17 17 17 17 17 17 17 17 17	
						161	运入 京 元	. •	:	•	212	
					•	120					100 V Sec. 200	
		•			- 5.	A SE	P121980 L	ALBION	MI	49226	7,677	<u>(24)</u>
					·	- Tri Bu	١٧٥ نظيم علا .		PRESTO O HOROWO YTEROO	IMM YDONG		
~	•	:		•			a distribution		•		NOT RESPONDE ON WHEN-A DES	en m
المحتن	· · ·						1	•				. MIE
Ŵ	E SUM STATE	ERTY PES	CHIBED DEI	LOW FOR	THE YEAR	1979. MARE	CATY OF A	LAS MELEL	HADING DEC			
Ù.	TOR THE PROP THE PAYABLE TE FEE DE	ERIT DES	THENDUKEN THENDUKEN	LOW FOR	THE YEAR	1979. MARE	CITY OF SE LIE W CAS	LBION, ČAL INNER, CIT)	HOUN COUNTY		4754-9	1 7
ù. Ç	TON THE PROPERTY OF THE PAYMOUS OF THE PAYMOUS TO T	TITOD THE WEN WON TO CITY TO CITY	MANAGER PROPERTY OF THE PROPER	LOW FOR B. AFTE BE ADDE	THE YEAR P. BERT 13. 0. 12.135	1979. MARE	CATY TIS LAPLING SE CAT N SII A + MDIBLA III	ALBION, CAL TAMER, CIT) O 57. ICHIOAN 49 TAME L3 SI C	HOUN COUNTY TREASURER 1224			1 7
ù. Çê	TOR THE PROP THE PAYABLE TE FEE DE	1+100 T+100 T= LEH HOU T 10 CLT. EBLL DER	uin mirr (Luganner Cuibed nei	ee adoe Pom eck Pom eck	THE YEAR IS	1979, MARE 1979 A	CATY DE A LAMIGE SE LIE W CAS ALBIGN+ N	LE SEESS	HOUN COUNTY TREASURER 1224 112 123 00		4754-9 RECEIPT NO & DO	1 T
ù. Ç	OFN THE PROPERTY OF THE PER DE TONE	ERTY ORAS TO CITY W PER MON 11-100 PENS	CHIBED DES TREASURES TON STON STON STON STON STON STON STON	DW FCR R, AFTE BE ADDE VAUE VAR	THE YEAR IS 12.135	1979 A	CITY OF A JAPAICE SE LIZ W CAS ALBIGH P ACCIS WAI RECYPLE SIL	1910N, CAL TAMER, CITY 557. ICHICAN 45 ICHICAN 45 ICHIC	TREASURER	401 R	4754-9 LECEIPY NO 6 DI TOTA	ATE:
ù. Çê	OF THE PROPERTY OF THE PAYMENT OF THE DE TO THE PAYMENT OF THE PAY	ERTY ORAS 10 CITY 11 CITY 124 PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS	CHIBED DES TREASURES THE WILL C TREE SIGN	LOW FCR R, AFTE BE ADOE VALUE FAR FOR LIN	THE YEAR 13.	ENSON PARE	CITY OF A JAPAN CE SE LIZ W CAS ALBIGN+ N ALCIS WAT ALCY N. S ALL J. S.	LE ASSESS	HOUN COUNTY TREASURER 1224 112) 23 00	401 R	4754-9 LECELPY ND & DI LA PROPERTIES	ATE
ù. Çê	OF THE PROPERTY OF THE PAYMENT OF THE DE TO THE PAYMENT OF THE PAY	ERTY ORAS 10 CITY 11 CITY 124 PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS	STON STONE	LOW FCR R, AFTE BE ADOE VALUE FAR FOR LIN	THE YEAR 13.	1979 A E ERECO	CITY OF A JAPAN CE SE LIZ W CAS ALBIGN+ N ALCIS WAT ALCY N. S ALL J. S.	1910N, CAL TAMER, CITY 557. ICHICAN 45 ICHICAN 45 ICHIC	TREASURER	401 R	4754-9 IECEIPT NO 6 DI TOTA IN PROPERTY	ATE
Ù.	OF THE PROPERTY OF THE PAYMENT OF THE DE TO THE PAYMENT OF THE PAY	ERTY ORAS 10 CITY 11 CITY 124 PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS	STON STONE	LOW FCR R, AFTE BE ADOE VALUE FAR FOR LIN	THE YEAR 13.	ENSON PARE	CITY OF A JAPAN CE SE LIZ W CAS ALBIGN+ N ALCIS WAT ALCY N. S ALL J. S.	LSION, CAL INNER, CIT 10 57. ICMICAN AS ICMICAN AS ICMICAN AS ICMICAN AS ICMICAN AS ICMICAN AS ICMICAN AS ICMICAN AS	HOUN COUNTY THE ASSURER 1224 112) 23 00 1 22	401 R	4754-9 ECEIPT NO & DI TOTA ST STATES	ATE
Ù.	OF THE PROPERTY OF THE PAYMENT OF THE DE TO THE PAYMENT OF THE PAY	ERTY ORAS 10 CITY 11 CITY 124 PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS PEAS	STON STONE	LOW FCR R, AFTE BE ADOE VALUE FAR FOR LIN	THE YEAR 13.	GHTS COLD IN	CITY OF A JAPAN CE SE LIZ W CAS ALBIGN+ N ALCIS WAT ALCY N. S ALL J. S.	1910N, CAL TAMER, CITY 557. ICHICAN 45 ICHICAN 45 ICHIC	HOUN COUNTY THE ASSURER 1224 112) 23 00 1 22	401 R	4754-9 ECEIPT NO & DI TOTA ST STATES	AT

THE TOTAL STREET OF THE TREET O THE SUN STATES DELIGHTS WELTH WILL BE ADDED 15 AND 10 APRIL HER PROPERTY DESCRIBED LELDH FOR THE YEAR 1981 APRIL ALTER AND 10 APRIL AND 10 APRIL AND 10 APRIL ALTER AND 10 APRIL AND 10 1 : 2 1 \ ġ TAX ASCRIPT NO 5 DATES पत्रका≛ ४४२<u>०</u> FUSD 7579 1579 ALVIUM ะ•∵ยร6 STALL: 1576 ADDITION ALG 5 159.05 12-135 CILL OF PUBION ASI V BECKELL OF A SIGNATURE SUBJECT OF A SIGNATURE TO WENT OF A SIGNATURE TO WENT OF THE SIGNATURE TO COLOR OF THE SIGNAT

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA	,
Plaintiff,	

CIVIL ACTION NO. 1:97-CV-1037

v

HON. David W. McKeague

CITY OF ALBION, MICHIGAN,

Defendant/Third-Party
Plaintiff/Counter-Defendant

v.

COOPER INDUSTRIES, INC., and CORNING INCORPORATED,

PROOF OF SERVICE

Third-Party Defendants/Counter-Plaintiffs/Third-Party Plaintiffs

v.

DECKER MANUFACTURING CORPORATION

Third-Party Defendant.

STATE OF MICHIGAN) ss: COUNTY OF KENT)

I, Theresa A. Symon, hereby certify that on the 4th day of September, 1998, I served a copy of CITY OF ALBION'S RESPONSES TO THIRD-PARTY DEFENDANTS COOPER AND CORNING'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION by regular mail, postage prepaid on the following parties-in-interest:

W. Francesca Ferguson
Assistant United States Attorney
Western District of Michigan
333 Ionia Avenue, N.W.
Suite 501
Grand Rapids, Michigan 49503

Kathleen K. Schnieders
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Francis J. Biros
Environmental Enforcement Section
Environment and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611

Alan D. Wasserman Michael L. Caldwell FINK ZAUSMER, P.C. 31700 Middlebelt Road Suite 150 Farmington Hills, Michigan 48334

Philip M. Moilanen
BULLEN, MOILANEN, KLAASEN
& SWAN, P.C.
402 S. Brown Street
Jackson, Michigan 49203-1426

Eugene E. Smary WARNER, NORCROSS & JUDD 900 Old Kent Building Grand Rapids, Michigan 49503

Dated: September 4, 1998

Subscribed and sworn to before me this 4th day of September, 1998

Sharon L. Schipper

Notary Public, Ottawa County Acting in Kent

My Commission Expires: 9/23/98